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Attorneys for: Material Witnesses AUGUSTIN CAVERO-ORTIZ, DONACIANO RAMIREZ-MERINO, and SEVERINO RAMIREZ-MEJIA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERTO TORRES-HERNANDEZ
AKA: GREGORIO CRUZ-MERINO (1),
MIGUEL MERINO-CALVERO (2),

Defendants.

Criminal Case No. 08 cr 1165-JM
Mag. Docket No. 08 mj 0961

**NOTICE OF MOTION AND MOTION
FOR VIDEO DEPOSITION AND
RELEASE OF MATERIAL WITNESSES
AUGUSTIN CAVERO-ORTIZ,
DONACIANO-RAMIREZ-MERINO, and
SEVERINO RAMIREZ-MEJIA**

JUDGE: Hon. Anthony J. Battaglia
CRTRM:

DATE: May 20, 2008
TIME: 3:30 p.m.

TO KAREN P. HEWITT, UNITED STATES ATTORNEY, LUELLA CALDITO,
ASSISTANT UNITED STATES ATTORNEY, DAVID PETERSON, COUNSEL FOR
DEFENDANT ROBERTO TORRES-HERNANDEZ (AKA: GREGORIO CRUZ-MERINO),
AND MAHIR SHERIF, COUNSEL FOR DEFENDANT MIGUEL MERINO-CALVERO.

PLEASE TAKE NOTICE that on **May 20, 2008, at 3:30 p.m.**, Gayle Mayfield-Venieris, counsel for the material witnesses AUGUSTIN CAVERO-ORTIZ (“CAVERO”), DONACIANO RAMIREZ-MERINO (“MERINO”) and SEVERINO RAMIREZ-MEJIA

1 (“**MEJIA**”), will move this Court for an order to take the video deposition of the material
2 witnesses, and for their immediate release.

3 **MOTION**

4 Material witnesses CAVERO, MERINO, and MEJIA, through their counsel, Gayle
5 Mayfield-Venieris, and pursuant to Federal Rules of Criminal Procedure, Rule 15, 18 U.S.C. §§
6 3142 and 3144, hereby move this Court for an order to take their deposition by videotape and
7 release them at the conclusion of the deposition.

8 This Motion is based on this Notice and the Memorandum of Points and Authorities
9 attached and filed herewith, the records of the above-entitled case, and all matters submitted to
10 the Court prior to the determination of this Motion.

11
12 Dated: May 7, 2008

Mayfield & Associates

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14 By: /s/ Gayle Mayfield-Venieris
15 Gayle Mayfield-Venieris, Esq.
16 Attorney for Material Witnesses
17 AUGUSTIN CAVERO-ORTIZ,
DONACIANO RAMIREZ-MERINO, and
SEVERINO RAMIREZ-MEJIA